

BRIAN BOYNTON  
Principal Deputy Assistant Attorney General  
Civil Division  
WILLIAM C. PEACHEY  
Director  
LAUREN FASCETT  
Senior Litigation Counsel  
JORDAN HUMMEL  
KEVIN HIRST  
HANA SHATILA  
DANIEL SCHUTRUM-BOWARD  
(MD Bar No. 1812120107)  
Trial Attorneys  
Office of Immigration Litigation  
United States Department of Justice  
P.O. Box 868, Ben Franklin Station  
Washington, DC 20044  
Tel 202-919-1670; Fax: (202) 305-7000  
Email: Daniel.R.Schutrum-Boward@usdoj.gov

*Counsel for Defendants*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

JOSEFINA DOE, *et al.*,

*Plaintiffs,*

v.

U.S. DEPARTMENT OF  
HOMELAND SECURITY, *et al.*,

*Defendants.*

Hon. Michael E. Farbiarz, U.S.D.J.  
Hon. Leda D. Wettre, U.S.M.J.

Civil Action No. 2:24-cv-09105  
(MEF) (LDW)

**DEFENDANTS' NOTICE OF  
MOTION TO TRANSFER VENUE  
AND STAY ALL DEADLINES**

**TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

**PLEASE TAKE NOTICE** that on November 4, 2024, or as soon as counsel

may be heard, the undersigned attorneys for Defendants<sup>1</sup> shall move this Court for an Order transferring this case to the Western District of Pennsylvania, pursuant to 28 U.S.C. § 1404(a), and to stay all deadlines during the pendency of the motion to transfer. In support of this motion, Defendants respectfully refer the Court to the following memorandum of law.

Dated: October 11, 2024

BRIAN M. BOYNTON  
Principal Deputy Assistant Attorney  
General  
WILLIAM C. PEACHEY  
Director, District Court Section  
Office of Immigration Litigation  
LAUREN E. FASCETT  
Senior Litigation Counsel  
JORDAN HUMMEL  
KEVIN HIRST  
HANA SHATILA  
Trial Attorneys

Respectfully submitted,

/s/ Daniel Schutrum-Boward  
Trial Attorney  
(MD Bar No. 1812120107)  
Department of Justice, Civil Division  
Office of Immigration Litigation,  
District Court Section  
P.O. Box 868, Ben Franklin Station  
Washington, D.C. 20044  
Tel 202-919-1670  
Fax: (202) 305-7000  
Daniel.R.Schutrum-Boward@usdoj.gov

*Counsel for Defendants*

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<sup>1</sup> Defendants are: U.S. Department of Homeland Security; U.S. Immigration and Customs Enforcement (“ICE”); Alejandro Mayorkas, Secretary of the Department of Homeland Security, in his official capacity; Patrick J. Lechleitner, Acting Director of ICE, in his official capacity; Daniel A. Bible, Executive Associate Director of ICE’s Enforcement and Removal Operations, in his official capacity; Cammilla Wamsley, Field Office Director for the ICE Philadelphia Field Office, in her official capacity; and Francis Kemp, Assistant Field Office Director for the ICE Philadelphia Field Office, in his official capacity.